



July 2, 2014

Ms. Katharine K. Buckner
Sandhills and Pulp & Paper Permitting Section
Engineering Services Division
Bureau of Air Quality
South Carolina Department of Health and Environmental Control
2600 Bull Street
Columbia, South Carolina 29201-1708

Re: Resolute FP US Inc.
Part 70 Operating Permit TV-2440-0005
Permit Renewal Application
Response to June 17 Questions

Dear Ms. Buckner:

On behalf of Resolute FP US Inc., please find the attached response to questions that you requested by electronic mail on June 17, 2014.

June 17 Question 1:

Construction permit –CF issued Sept 28, 1989 was for the construction of a 450 ton CaO/day vertical Lime Regenerator controlled by cyclones and baghouse. Is this part of the equipment listed in Emission Unit ID 07 – Chemical Recovery? If so what is the equipment ID? If not listed in ID 07, should it be? Was the unit installed?

June 17 Response 1:

The Vertical Lime Regenerator was replaced by the No. 2 Lime Kiln.

June 17 Question 2:

For IDs 03 and 04: c/p-DC called for the review of the monitored parameters and re-establish them if necessary. What was the result of this review? It appears additional loading was added to the control devices with the addition of the Filtrate Separation System. If updated ranges were submitted, what was the date of the submittal?

June 17 Response 2:

The DC modifications to ID's 03 and 04 were completed approximately one month after the No. 1 paper machine was shutdown due to economic conditions. As a result of poor economic conditions, production rates for ID's 03 and 04 have been well below the production levels prior to the DC modifications. Since the production levels following the DC modifications have been lower, the ranges have not required updating.

June 17 Question 3:

In the expired TV and renewal application there are two control devices listed in the control device table:

Unit ID	Control Device ID	Description	Installation Date/ Modification Date
08	9820	Stripper Off Gases (Collection)	2001
09	9810	Condensate Steam Stripper	2001

I do not see these included with the noted emission units. Should they be?

June 17 Response 3:

In Title V Table 5.2 (Control Devices), the Stripper Off Gases (Collection) should be Unit ID 09 and the Condensate Steam Stripper should be Control Equipment ID 9801.

The Condensate Steam Stripper is listed as ID 9801 in Title V Tables 5.19 (waste treatment sources) and 5.20 (waste treatment control devices) and Form C of the renewal application. The Stripper Off Gases (SOG) Collection system is also included in Tables 5.19 and 5.20 and Form C as part of Unit ID 09.

June 17 Question 4:

Roads – after calculating the lb/yr rates, emission factors were developed based on the paper production. It appears the factors were based on 962,505 ADT/yr (2637 ADT/day). However, those factors are then multiplied by a production rate of 1825 ADT/day to estimate the potential to emit from the roads. Why was this done? It seems that the original lb/yr rates should be used as the PTE and emission factors can be derived using the 1825 ADT/day.

June 17 Response 4:

The emission factors and calculations in Form D have been revised to utilize paper production.

June 17 Question 5.1:

1) The expired TV lists the following as control devices for Waste Treatment, in addition to the two Combination Boilers –

- 800 gal/minute Condensate Steam Stripper
- Stripper Off Gases (SOG) Collection System

But these two sources are also listed as equipment under Waste Treatment. Is this correct? If so please explain. If not, where should these two sources be listed: as controls or as equipment for Waste Treatment?

June 17 Response 5.1:

The condensate steam stripper and SOG collection system are listed as both equipment and control devices for Unit ID 09, in a similar manner to the LVHC and HVLC collection systems (control devices for Unit ID 02 and equipment for Unit ID 08).

The LVHC, HVLC, and SOG systems include numerous components and are subject to MACT monitoring requirements, so they were listed as equipment as well as control devices. The condensate steam stripper was listed as equipment because it uses process steam, as well as being a control device.

June 17 Question 5.2:

- 2) Please provide emission factors and any other information necessary so emission calculations for the Waste Treatment can be verified.

June 17 Response 5.2:

The emission factors and other information are attached.

June 17 Question 5.3:

- 3) Uncontrolled and Controlled rates are the same, please explain.

June 17 Response 5.3:

The uncontrolled VOC and methanol emission rates have been changed consistent with the February 2000 permit application.

June 17 Question 5.4:

- 4) Please explain the Max. Controlled calculation for VOC as C. It uses Acetaldehyde and Methanol.

June 17 Response 5.4:

The VOC as C calculation has been added to the "carbon-to-voc" spreadsheet and updated in Form D.

June 17 Question 5.5:

- 5) Pump calculations account for 4 pumps. Depending on responses to ID 05 above, calculations may need to be updated to remove other two pumps.

June 17 Response 5.5:

The calculations in Form D have been updated to reflect two pumps.

June 17 Question 5.6:

- 6) Please double check the factor for CO₂. Some of the GHGs and global warming potentials changed at the beginning of 2014. (Please fix all calcs for GHGs if necessary.)

June 17 Response 5.6:

EPA changed the GWP after the submittal of the Title V renewal application. All calculations are based on the GWP at the time of the original renewal application. The calculations in Form D have been revised to reflect the new EPA GWP.

June 17 Question 5.7:

7) Propylene and Total PAH are pollutants that are found in AP-42 Ch. 3 but were not accounted for on the calculation sheet for the pumps in ID09. Please add. Also, several of the individual PAHs listed in AP-42 Ch. 3 are HAPs but are not accounted for in the HAP total on the calculation sheet.

June 17 Response 5.7:

Propylene and total PAH have been added to the emission calculations in Form D. The only PAH identified in Table 3.3-2 as a HAP is naphthalene, which is included in the total HAP summation.

June 17 Question 5.8:

8) The expired TV has PM emission limits assigned to the pumps. Is this necessary? Why were the limits assigned? I was considering removing the PM limitation. What are your thoughts on this?

June 17 Response 5.8:

Construction permits CV and CU state these units are subject to Standard No. 4. If they are not subject to Standard No. 4, then the PM and Opacity limits can be removed.

June 17 Question 6:

- 1) The Air Makeup Units only list natural gas and propane as fuels in the expired TV and the TV renewal application. However, emissions were estimated using Kerosene from these units. Has Kerosene been permitted as a fuel from these sources? What permit number?

June 17 Response 6:

Kerosene is not burned in these units. Kerosene has been removed as a fuel in the calculations.

June 17 Question 6.1:

Paper Machine No. 3 – is the max production rate correct in calculation sheet? If you use the production rate from the equipment description (as appears to have been done w/ Nos. 1 and 2) I get 1,049 ADT Paper /day (382,917 ADT Paper/yr / 365 day/yr)

June 17 Response 6.1:

The No. 3 paper machine production has been corrected to the current permitted maximum rate of 382,917 ADTFP/yr or 1,049.1 ADTFP/day in the calculations in Form D.

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If you have any questions, require further clarification, or need additional information regarding the application or this submittal, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Steven R. Moore". The signature is written in a cursive, flowing style.

Steven R. Moore
URS Corporation

Attachments

cc: Mr. Dale Herendeen – Resolute FP US Inc.